

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

ARIANE ROWLAND, and JAMIE
SCHULZE,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC., WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE
MAPLEY SR.,

Defendants.

Cause No. CV 20-59-BLG-SPW

**DEFENDANT WATCH TOWER
BIBLE AND TRACT SOCIETY OF
NEW YORK, INC.'S RESPONSES
TO PLAINTIFFS' FIRST SET OF
JURISDICTIONAL DISCOVERY**

TO: Plaintiffs and their counsel, Robert L. Stepan, Ryan R. Shaffer, and James C. Murnion, MEYER SHAFFER & STEPANS PLLP, 430 Ryman Street, Missoula, MT 59802

COMES NOW Defendant Watch Tower Bible and Tract Society of New York, Inc. (hereinafter "WTNY"), by and through its attorneys, and responds to Plaintiffs' Second Set of Jurisdictional Discovery as follows:

Defendant Watch Tower Bible and Tract Society of New York, Inc.'s Responses to
Plaintiffs' First Set of Jurisdictional Discovery - 2

GENERAL OBJECTION

In the Court's Orders Re Scope of Jurisdictional Discovery (Doc. 47 in the *Caekaert* matter¹; Doc. 37 in the *Rowland* matter²), the Court concluded "[d]iscovery regarding WTPA's corporate relationship with WTNY from 1973 to 1992 is...appropriate." See Doc. 47 (in the *Caekaert* matter), p. 5; Doc. 37 (in the *Rowland* matter), p. 5. Accordingly, any discovery requests seeking information before 1973 or after 1992 are improper and outside the scope of Court-ordered limitations on jurisdictional discovery.

INTERROGATORIES

INTERROGATORY NO. 1: Please describe the role of the Society Legal Department for WTNY, by year, from 1970-1995.

ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. The interrogatory is also vague as to the term "Society Legal Department." Subject to and without waiving these objections: The Legal Department for Watchtower Bible and Tract Society of New York, Inc., provided general counsel services.

INTERROGATORY NO. 2: Please identify each treasurer who served for WTNY between 1970 and present.

¹ References to the *Caekaert* matter means Cause No. CV 20-52-BLG-SPW

² References to the *Rowland* matter means Cause No. CV 20-59-BLG-SPW.

ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection, WTNY produces the following names of individuals (all of whom are deceased):

1973 N. H. Knorr President
 F. W. Franz Vice President
 G. Suiter Secretary and Treasurer
 J. O. Groh Assistant Secretary—Treasurer
 M. G. Henschel Director
 W. K. Jackson Director
 L. A. Swingle Director

1974 N. H. Knorr President
 F. W. Franz Vice President
 G. Suiter Secretary and Treasurer
 J. O. Groh Assistant Secretary—Treasurer
 M. G. Henschel Director
 W. K. Jackson Director
 L. A. Swingle Director

1975 N. H. Knorr President
 F. W. Franz Vice President
 G. Suiter Secretary and Treasurer
 W. K. Jackson Assistant Secretary—Treasurer
 M. G. Henschel Director
 L. A. Swingle Director

1976 N. H. Knorr President
 F. W. Franz Vice President
 W. L. Barry Vice President
 G. Suiter Secretary and Treasurer
 W. K. Jackson Assistant Secretary—Treasurer
 M. G. Henschel Director
 L. A. Swingle Director

1977 F. W. Franz President

M. G. Henschel	Vice President
W. L. Barry	Vice President
G. Suiter	Secretary and Treasurer
W. K. Jackson	Assistant Secretary—Treasurer
L. A. Swingle	Assistant Secretary—Treasurer
J. C. Booth	Director

1978

F. W. Franz	President
M. G. Henschel	Vice President
W. L. Barry	Vice President
G. Suiter	Secretary and Treasurer
W. K. Jackson	Assistant Secretary—Treasurer
L. A. Swingle	Assistant Secretary—Treasurer
J. C. Booth	Director

1979

F. W. Franz	President
M. G. Henschel	Vice President
W. L. Barry	Vice President
G. Suiter	Secretary and Treasurer
W. K. Jackson	Assistant Secretary—Treasurer
L. A. Swingle	Assistant Secretary—Treasurer
J. C. Booth	Director

1980

F. W. Franz	President
M. G. Henschel	Vice President
W. L. Barry	Vice President
G. Suiter	Secretary and Treasurer
W. K. Jackson	Assistant Secretary—Treasurer
L. A. Swingle	Assistant Secretary—Treasurer
J. C. Booth	Director

1981

F. W. Franz	President
M. G. Henschel	Vice President
W. L. Barry	Vice President
G. Suiter	Secretary and Treasurer
W. K. Jackson	Assistant Secretary—Treasurer
L. A. Swingle	Assistant Secretary—Treasurer
J. C. Booth	Director

1982	F. W. Franz	President
	M. G. Henschel	Vice President
	W. L. Barry	Vice President
	G. Suiter	Secretary and Treasurer
	L. A. Swingle	Assistant Secretary—Treasurer
	J. E. Barr	Assistant Secretary—Treasurer
	J. C. Booth	Director
 1983	 F. W. Franz	 President
	M. G. Henschel	Vice President
	W. L. Barry	Vice President
	G. Suiter	Secretary and Treasurer
	L. A. Swingle	Assistant Secretary—Treasurer
	J. E. Barr	Assistant Secretary—Treasurer
	J. C. Booth	Director
 1984	 F. W. Franz	 President
	M. G. Henschel	Vice President
	W. L. Barry	Vice President
	L. A. Swingle	Secretary and Treasurer
	J. E. Barr	Assistant Secretary—Treasurer
	J. C. Booth	Assistant Secretary—Treasurer
	T. Jaracz	Assistant Secretary—Treasurer
 1985	 F. W. Franz	 President
	M. G. Henschel	Vice President
	W. L. Barry	Vice President
	L. A. Swingle	Secretary and Treasurer
	J. E. Barr	Assistant Secretary—Treasurer
	J. C. Booth	Assistant Secretary—Treasurer
	T. Jaracz	Assistant Secretary—Treasurer
 1986	 F. W. Franz	 President
	M. G. Henschel	Vice President
	W. L. Barry	Vice President
	L. A. Swingle	Secretary and Treasurer
	J. E. Barr	Assistant Secretary—Treasurer
	J. C. Booth	Assistant Secretary—Treasurer
	T. Jaracz	Assistant Secretary—Treasurer

1987 F. W. Franz President
M. G. Henschel Vice President
W. L. Barry Vice President
L. A. Swingle Secretary and Treasurer
J. E. Barr Assistant Secretary—Treasurer
J. C. Booth Assistant Secretary—Treasurer
T. Jaracz Assistant Secretary—Treasurer

1988 F. W. Franz President
M. G. Henschel Vice President
W. L. Barry Vice President
L. A. Swingle Secretary and Treasurer
J. E. Barr Assistant Secretary—Treasurer
J. C. Booth Assistant Secretary—Treasurer
T. Jaracz Assistant Secretary—Treasurer

1989 F. W. Franz President
M. G. Henschel Vice President
W. L. Barry Vice President
L. A. Swingle Secretary and Treasurer
J. E. Barr Assistant Secretary—Treasurer
J. C. Booth Assistant Secretary—Treasurer
T. Jaracz Assistant Secretary—Treasurer

1990 F. W. Franz President
M. G. Henschel Vice President
W. L. Barry Vice President
L. A. Swingle Secretary and Treasurer
J. E. Barr Assistant Secretary—Treasurer
J. C. Booth Assistant Secretary—Treasurer
T. Jaracz Assistant Secretary—Treasurer

1991 F. W. Franz President
M. G. Henschel Vice President
W. L. Barry Vice President
L. A. Swingle Secretary and Treasurer
J. E. Barr Assistant Secretary—Treasurer
J. C. Booth Assistant Secretary—Treasurer
T. Jaracz Assistant Secretary—Treasurer

1992	F. W. Franz	President
	M. G. Henschel	Vice President
	W. L. Barry	Vice President
	L. A. Swingle	Secretary and Treasurer
	J. E. Barr	Assistant Secretary—Treasurer
	J. C. Booth	Assistant Secretary—Treasurer
	T. Jaracz	Assistant Secretary—Treasurer

INTERROGATORY NO. 3: Please identify each corporate officer (e.g. Chief Executive Officer, Chief Financial Officer, etc.) by year, for WTNY between 1970 and present.

ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection: See Response to Interrogatory No. 2.

INTERROGATORY NO. 4: Please identify all members of the board of directors of WTNY, by year, between 1970 and present.

ANSWER: Objection. Please refer to the General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection: See Response to Interrogatory No. 2. Each person identified there as an executive officer also served as a director.

INTERROGATORY NO. 5: Please identify the headquarters address for WTNY, by year, between 1970 and present